



Alfonzo is a product of the streets of St. Louis, he never had a father figure growing up, his father was always in jail for drug charges. The men that he did observe were physical abusive toward his mother especially when they were using drugs (heroin). Alfonzo and his siblings were raised by his mother and his maternal great grandmother. Life was also hard financially the family went without food, struggled to keep on the utilities and proved shelter. No one was around to give guidance to this young boy/man, so the streets became the teacher, and the lessons were not good. Alfonzo grew up in a violent and drug infested neighborhood and it shaped the way he saw the world. He dropped out of high school in 10<sup>th</sup> grade , which made his job choices extremely limited.

The factors of 18 USC 3553(a) allow “the court to look at the nature and circumstances of the offense and the history and characteristics of the defendant.” The defense is very much aware that Alfonzo’s story is not a new one to this court or any court in St. Louis City. The reality is that we need to work on individuals like Alfonzo so that we may be able to produce a better community and future.

If the court gives the defendant an opportunity through a downward variance and sets up treatment programs for him this could be the defendants first real chance to live a life with a future instead of jail and death.

Conclusion

Mr. Taylor is asking this court to grant him a downward variance in this case.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on January 24, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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